

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                                  |   |                                |
|----------------------------------|---|--------------------------------|
| <b>In re:</b>                    | § | <b>CHAPTER 11</b>              |
|                                  | § |                                |
| <b>WELLPATH HOLDINGS, et al.</b> | § | <b>Case No. 24-90533 (ARP)</b> |
|                                  | § |                                |
| <b>Debtors.</b>                  | § | <b>(Jointly Administered)</b>  |

**CREDITOR EDWARD MAJOR’S WITNESS AND EXHIBIT LIST**

Creditor Edward Major (“Mr. Major”) submits the following Witness and Exhibit List for the evidentiary hearing scheduled for January 14, 2025 at 9:30 am (prevailing Central Time) before the Honorable Alfredo R. Pérez, United States Bankruptcy Judge, 515 Rusk Street, Courtroom 400, Houston, Texas, 77002 regarding Debtors’ Amended Emergency Motion for Entry of Interim and Final Orders to Enforce the Automatic Stay or in the Alternative Extend the Stay to Non-Debtor Defendants (Docket No. 17).

**WITNESSES**

At the hearing, counsel for Mr. Major may call witnesses called by another party or needed for rebuttal or impeachment.

**EXHIBITS**

At the hearing, counsel for Mr. Major may offer one or more of the following exhibits:

| <b>Ex. No.</b> | <b>Description</b>                                       | <b>Offered</b> | <b>Objection</b> | <b>Admitted/ Not Admitted</b> | <b>Disposition</b> |
|----------------|--|----------------|------------------|-------------------------------|--------------------|
| Major Ex. A    | Second Amended Complaint                                 |                |                  |                               |                    |
| Major Ex. B    | Dr. Herbig’s Medical Professional Liability Policy       |                |                  |                               |                    |
| Major Ex. C    | Dr. Herbig letter to District Court in the Major Lawsuit |                |                  |                               |                    |
| Major Ex. D    | Dr. Herbig and Debtors’ Suggestion of Bankruptcy         |                |                  |                               |                    |

| Ex. No.     | Description  | Offered | Objection | Admitted/ Not Admitted | Disposition |
|-------------|--|---------|-----------|------------------------|-------------|
| Major Ex. E | Proposed Order re Debtors' Emergency Motion                    |         |           |                        |             |
|             | Any Pleading on file in these cases                            |         |           |                        |             |
|             | Any exhibits listed, designated, or offered by any other party |         |           |                        |             |
|             | Any exhibits necessary for rebuttal                            |         |           |                        |             |

Mr. Major reserves the right to modify, amend, or supplement this Witness and Exhibit List at any time prior to the Hearing. Mr. Major reserves the right to ask the Court to take judicial notice of pleadings, orders, transcripts, and/or other documents filed in or in connection with these chapter 11 cases, and to offer rebuttal exhibits. Designation of any exhibit above does not waive any objection Mr. Major may have to any exhibit listed on any other party's exhibit list.

DATED this 9<sup>th</sup> day of January, 2025.

Respectfully submitted,

K&L GATES LLP

/s/ Brandy A. Sargent

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*Attorneys for Creditor Edward Majors*

**CERTIFICATE OF SERVICE**

I certify that on January 9, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Brandy A. Sargent  
Brandy A. Sargent